

Application No. 09/881,785
Response Notice of Non-Compliant Amendment Dated 02/15/2006
February 22, 2006

REMARKS

Rejection under 35 U.S.C. § 103

The Examiner rejected claims 22–32 under 35 U.S.C. § 103(a) as being obvious over Broussard (U.S. Patent 6,317,776) in view of Golden (U.S. Patent 6,452,924). Applicant respectfully traverses.

Claim 22, as amended, is drawn to a system comprising a processor that converts videoconferencing data into a standard media format appropriate for computer systems. Claim 24, as amended, is drawn to a processor that converts videoconferencing data into a standard media format appropriate for computer systems. Claim 26, as amended, is drawn to a method of converting data into a standard media format appropriate for computer systems.

The Examiner contends that Broussard teaches a processor “that receives data into a standard format appropriate for computer systems” and cites col. 6, ll. 14–35 for this proposition. Examiner then admits that Broussard does not disclose reassembling the data. Examiner then proposes that Golden teaches reassembling data at col. 27, ll. 50–67. However, Examiner is parsing words of the limitation to the point of destroying the meaning of the limitation.

Each of Applicant’s claims requires that (1) data be received in a format suitable for real time processing and (2) that the data be converted (formerly reassembled) into “a standard format appropriate for computer systems.” Thus, the limitation requires “converting data into a standard media format appropriate for computer systems.”

Examiner has conceded that Broussard does not teach or suggest reassembling the data. To further clarify the meaning of Applicant’s limitation, “reassemble” as been replaced with “convert.” Support for this limitation occurs throughout the specification, as the “reassemble” and “convert” are used as synonyms. See, for example, paragraph [0020]. No matter which word is used, it is clear that Broussard does not teach converting audio and video data from a first format, suitable for real time transport, to a second format, suitable for standard computer systems. Various examples of formats suitable for standard computer systems are described in the specification and in the dependent claims. Broussard does not teach or suggest converting a format suitable for real time protocol into any of these formats.

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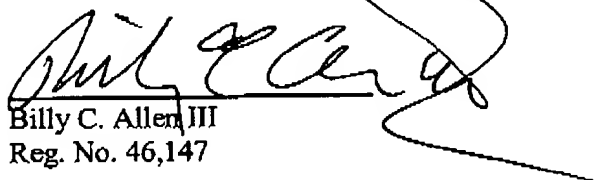
Golden does not supply this missing limitation. The cited passage of Golden does teach "reassembling" data, but not as that term was used in Applicant's claims. In any case, based on the amended claim language that requires "converting data into a standard media format appropriate for computer systems," it is clear that Golden is irrelevant. Golden relates to network transport and contains no teaching or suggestion of conversion of multimedia data from one format to another.

Accordingly, the combination of Broussard and Golden does not teach or suggest each and every limitation of independent claims 22, 24, and 26. As Examiner knows, it is his burden to establish a *prima facie* case of obviousness, and that one element of this is that the combination of references teach or suggest each limitation of the claims. MPEP § 2143. Because the combination of Broussard and Golden does not teach "converting data into a standard media format appropriate for computer systems," the rejection of claims 22-43 is improper. Reconsideration and withdrawal of this rejection, and a notice of allowance for these claims is therefore respectfully requested.

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Respectfully submitted,

2/22/06
Date


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